



DEPARTMENT OF PARKS AND RECREATION
Orange Coast District
3030 Avenida Del Presidente
San Clemente, California 92672

Ruth G. Coleman, Director

October 29, 2003

Michael P. McCann, Supervising Engineer
California Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, California 92123

Re: POTW:01-01045.02:VASQV
Tentative Order NO. R9-2003-0228
Tentative Order NO. R9-2003-0285

2003 OCT 29 PM 2:33

Dear Mr. McCann:

Thank you for the opportunity to provide comments on the pending orders by the San Diego Regional Water Quality Control Board. The California Department of Parks and Recreation (State Parks) will continue to work closely with your staff to ensure the protection of water quality at Crystal Cove State Park.

Please consider the following comments and/or requests for clarifications prior to submitting this action to the Board.

- Please provide specific dates for when State Parks will be required to sample and report on surface waters, groundwater and effluent.
- Waste Discharge Report, Section A (2) establishes what we believe are "boilerplate" prohibitions. However, it is not clear how these may be interpreted in light of the Waste Discharge Report, Cease and Desist Order and the specific prohibitions found within. We believe it is best to eliminate this provision, or at least indicate that nothing in this provision will be deemed to override the specific prohibitions of the WDR and CDO.
- Please clarify specifically what Section A(3), Waste Discharge Report prohibits State Parks from doing in light of the specific prohibitions found in the WDR and the CDO
- Waste Discharge Report, Section A (6-7). Please define "sewage solids" and "disposal site".

October 29, 2003

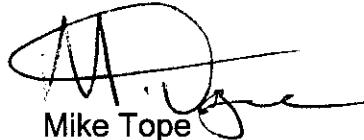
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- Waste Discharge Report, Section C (3). We believe CDO (Flood Protection) should be expanded to include "Runoff Protection".

In addition to complying with the Board's mandates established within the CDO and the WDR, State Parks will be completing the final phase of planning for the conversion of private El Morro Mobile Home Park to public park facilities. The current leases will expire December 31, 2004 and State Parks anticipates beginning construction January, 2005. The conversion project includes the connection of new park facilities to the municipal sewer system, El Morro Creek restoration, elimination of all nuisance flows to the Pacific Ocean, comprehensive storm water treatment system and public parking and camping facilities. We and the public look forward towards the completion of this significant project.

Thank you and please call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Tope", with a large, stylized "M" and a long horizontal stroke extending to the right.

Mike Tope
District Superintendent

Cc: Roberto Brutuco, El Morro Village, Inc.